

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**JATONYA MULDROW,**

PLAINTIFF,

**V.**

**CITY OF ST. LOUIS, et al.**

DEFENDANTS.

**Case No.: 4:18-cv-02150AGF**

**DEFENDANTS' SUPPLEMENTAL MOTION FOR AMENDMENT TO  
SECOND AMENDED CASE MANAGEMENT ORDER**

COME NOW the Defendants by and through counsel, and do hereby supplement their request to amend the Court's Second Amended Case Management Order, which was entered on December 18, 2019. Doc 32.

1. Defendants filed their Motion for Amendment to Second Amended Case Management Order seeking a 30-day extension to file their Motion for Summary Judgment at 10:52 am on June 1, 2020. Doc. 35

2. Out of concern that this Court would not have time to review and respond to Defendants' Motion for Amendment to Second Case Management Order as well as in an abundance of caution to not waive Defendants' opportunity to file a dispositive motion, counsel for Defendants made every effort in good faith to complete a Motion for Summary Judgment and file it in accordance with the current June 1, 2020 deadline.

3. Counsel for Defendants encountered the following impediments, in addition to those cited in their earlier Motion for Amendment (Doc. 35), to completing their Motion for Summary Judgment on June 1, 2020:

- a. Counsel for Defendants is currently restricted to working from home with a laptop provided by the City Counselor's Office.
- b. The laptop provided by the City Counselor's Office does not have any form of Adobe editing software which is needed to organize, label and edit exhibits from their current "PDF" formats (i.e. pull out relevant pages from depositions) related to Defendants' Statement of Uncontroverted Facts.
- c. The City Counselor's Office currently has one desktop located in the City Hall office with the required software needed to organize and label exhibits.
- d. All physical hard copies of documents that could be copied and scanned for filing as exhibits instead of manipulating from their digital PDF format are located at Counsel for Defendants' City Hall office.
- e. Support staff for the City Counselor's Office is limited to reduced, rotating schedules.
- f. Counsel for Defendants is working from home and was unable to reach any support staff over the phone.
- g. Large protests have broken out nation-wide in response to recent incidents of police brutality against African American citizens. One such protest took place in downtown St. Louis today (June 1, 2020), starting at the St. Louis City Justice Center. Protesters began blocking Tucker Boulevard in front of City Hall between 3 and 3:30 p.m.
- h. City Hall regularly leaves one gate open on the East/Tucker entrance such that employees can come in through the front door (or knock on the door if it is locked) and show their employee ID to the Marshal on duty for entrance after hours.

- i. Although the downtown protest was still active, Counsel for Defendants attempted to gain entrance to City Hall at approximately 7:45 p.m. and found every entrance gated with chains such that Counsel for Defendants could not reach any doors.

WHEREFORE, the Defendants respectfully supplement and renew their request for an amendment to the current Case Management Order, as set forth above and in Defendants' Motion for Amendment to Second Amended Case Management, and for such further relief as the Court deems just and necessary under the facts and circumstances of this case.

Respectfully submitted,  
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